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Richard J. Corbi

*Counsel to Michael Wyse, the Expert*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	<b>Chapter 11</b>
	:	
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	:	<b>Case No. 18-23538 (RDD)</b>
	:	
Debtors. <sup>1</sup>	:	<b>(Jointly Administered)</b>
	:	
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**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that The Law Offices of Richard J. Corbi PLLC hereby  
appears in the above-captioned cases (the “Chapter 11 Cases”) as counsel for Michael Wyse (the

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); SR – Rover de Puerto Rico, LLC (f/k/a Sears, Roebuck de Puerto Rico, Inc.) (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Rover Brands Business Unit, LLC (f/k/a Sears Brands Business Unit Corporation) (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors’ corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

“Expert”), the Expert appointed in the above-captioned Chapter 11 Cases on December 9, 2019 in accordance with that certain *Order Directing the Appointment of an Expert Pursuant to Federal Rule of Evidence 706* [Docket No. 6166], pursuant to Rules 2002, 3017(a), 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 9074-1(c) of the Local Bankruptcy Rules for the Southern District of New York and Sections 102(1) and 1109(b) of the United States Bankruptcy Code and respectfully requests that all notices given or required to be given in this case, and all papers served or required to be served in the Chapter 11 Cases, be given to and served upon the following:

Richard J. Corbi, Esq.  
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**PLEASE TAKE FURTHER NOTICE** that the foregoing request includes, without limitation, a request for service of all orders and notices of any application (including those required by Bankruptcy Rule 2002), motion, petition, pleading, request, chapter 11 plan, disclosure statement, complaint, or demand, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex, or otherwise filed or made with regard to the Chapter 11 Cases and any and all adversary proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that neither this notice nor any subsequent appearance, pleading, claim, or suit shall constitute a waiver of the Expert’s rights (1) to have an Article III judge adjudicate in the first instance any case, proceeding, matter, or controversy as to which a bankruptcy judge may not enter a final order or judgment consistent with Article III of the

United States Constitution; (2) to have final orders in non-core matters entered only after *de novo* review by a higher court; (3) to trial by jury in any proceeding so triable herein or any case, controversy, or proceeding related to hereto; (4) to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (5) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Expert is or may be entitled under agreements, in law or equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are hereby expressly reserved.

**PLEASE TAKE FURTHER NOTICE** that the Expert does not consent to the entry of final orders or judgments by the Court if it is determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Dated: December 18, 2019

**THE LAW OFFICES OF RICHARD J. CORBI PLLC**

/s/ Richard J. Corbi

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